

EXHIBIT A



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 12, 2017

VIA EMAIL AND U.S. MAIL

Dae Y. Lee
Bernstein Liebhard LLP
10 E. 40th Street
New York, NY 10016
dlee@bernlieb.com

Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Warren v. 3M Company et al et al Case No.: 0:17-cv-01027-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Warren _Michael _017-cv-01027_1_Warren _Michael _017-cv-01027_1"

Warren _Michael
_017-cv-
01027_1_Warren
_Michael _017-cv-
01027_1

PLAINTIFFS' LAST NAME - Warren
PLAINTIFFS' FIRST NAME - Michael
CASE NO. - 0:17-cv-01027
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 10
SECTION III (SURGERY INFORMATION) -
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) -
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION -
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Bernstein Liebhard LLP
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dburke@bernlieb.comdburke@bernlieb.comdburke@bernlieb.com,
dlee@bernlieb.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

September 18, 2017

VIA EMAIL AND U.S. MAIL

David Hodges
Kennedy Hodges, L.L.P.
4409 Montrose Blvd, Ste 200
Houston, TX, 77006
mtg@kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Petrakis v. 3M Company et al Case No.: 0:17-cv-01082-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Petrakis_Gus_17-cv-1082_2_Petrakis_Gus_17-cv-1082_2"

Petrakis_Gus_17-cv-
1082_1_Petrakis_Gus_
17-cv-1082_1

PLAINTIFFS' LAST NAME - Petrakis
PLAINTIFFS' FIRST NAME - Gus
CASE NO. - 17-cv-1082
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12, 13
SECTION III (SURGERY INFORMATION) -
SECTION IV - 1 (VITAL STATISTICS) - Incomplete
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete
SECTION IV - 9 (TOBACCO) - Incomplete
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete
SECTION V - 6 (LAWSUITS) - Incomplete
SECTION V - 7 (BANKRUPTCY) - Incomplete
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges, L.L.P.
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodes.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

September 28, 2017

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, L.L.P.
4409 Montrose Blvd, Ste 200
Houston, TX, 77006
mtg@kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Sellers v. 3M Company et al et al Case No.: 0:17-cv-01879-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Sellers_William_17-cv-1879_1_Sellers_William_17-cv-1879_1"

Sellers_William_17-
cv-
1879_1_Sellers_Willia
m_17-cv-1879_1

PLAINTIFFS' LAST NAME - Sellers
PLAINTIFFS' FIRST NAME - William
CASE NO. - 17-cv-1879
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12
SECTION III (SURGERY INFORMATION) -
SECTION IV - 1 (VITAL STATISTICS) - Incomplete
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete
SECTION IV - 9 (TOBACCO) - Incomplete
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete
SECTION V - 6 (LAWSUITS) - Incomplete
SECTION V - 7 (BANKRUPTCY) - Incomplete
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) - Incomplete
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 12, 2017

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, L.L.P.
4409 Montrose Blvd, Ste 200
Houston, TX, 77006
mtg@kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Osborne v. 3M Company et al et al Case No.: 0:17-cv-02099-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Osborne_Vanessa_17-cv-2099_1_Osborne_Vanessa_17-cv-2099_1"

Osborne_Vanessa_17-
cv-
2099_1_Osborne_Vane
ssa_17-cv-2099_1

PLAINTIFFS' LAST NAME - Osborne
PLAINTIFFS' FIRST NAME - Vanessa
CASE NO. - 17-cv-2099
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS - 03
SECTION IV - 1 (VITAL STATISTICS) - Incomplete
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete
SECTION IV - 9 (TOBACCO) - Incomplete
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete
SECTION IX - 3 (RESIDENCES) - Incomplete
SECTION IX - 4 (MARRIED) - Incomplete
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete
SECTION V - 6 (LAWSUITS) - Incomplete
SECTION V - 7 (BANKRUPTCY) - Incomplete
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) - Incomplete
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete
SECTION VI - 9 (AUGUSTINE) - Incomplete
SECTION VII - 1 (LOST PAST WAGES) - Incomplete
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com

EXHIBIT B



August 24, 2017

Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 600
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Grooms v. 3M Company Case No.: 00:17-cv-00343-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Grooms_Noble_017-cv-00343_1_Grooms_Noble_017-cv-00343_1"

Grooms_Noble_017-
cv-
00343_1_Grooms_Nob
le_017-cv-00343_1

PLAINTIFFS' LAST NAME - Grooms
PLAINTIFFS' FIRST NAME - Noble
CASE NO. - 0:17-cv-00343
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS - 03
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) - Incomplete
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 03, 2017

VIA EMAIL AND U.S. MAIL

Seth Webb
Brown & Crouppen, PC
211 North Broadway, Suite 1600
St. Louis, MO 63102
sethw@getbc.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Johnson v. 3M Company et al Case No.: 0:17-cv-00640-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Johnson_Carolyn_017-cv-640_1_Johnson_Carolyn_017-cv-640_1"

Johnson_Carolyn_017
-cv-
640_1_Johnson_Carol
yn_017-cv-640_1

PLAINTIFFS' LAST NAME - Johnson
PLAINTIFFS' FIRST NAME - Carolyn D.
CASE NO. - 0:17-cv-640
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) -
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS - 03
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) -
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION -
X.02.D.1 - DOCUMENTS - SIGNED VERIFICATION (NON-PFS RESPONSE) -
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Brown & Crouppen
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - sethw@getbc.com



October 12, 2017

Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Garcia v. 3M Company Case No.: 0:17-cv-00711-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Garcia_Gilbert_017-cv-00711_1_Garcia_Gilbert_017-cv-00711_1"

Garcia_Gilbert_017-
cv-
00711_1_Garcia_Gilber
t_017-cv-00711_1

PLAINTIFFS' LAST NAME - Garcia
PLAINTIFFS' FIRST NAME - Gilbert
CASE NO. - 0:17-cv-00711
SECTION I (CASE INFORMATION) - Incomplete
SECTION I - INCOMPLETE QUESTIONS - 04
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 08, 09, 10
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS - 04, 05
SECTION IV - 1 (VITAL STATISTICS) - Incomplete
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete
SECTION IV - 9 (TOBACCO) - Incomplete
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 12, 2017

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Gruetzmacher v. 3M Company Case No.: 0:17-cv-00998-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Gruetzmacher_Laura_017-cv-00998_1_Gruetzmacher_Laura_017-cv-00998_1"

Gruetzmacher_Laura
_017-cv-
00998_1_Gruetzmache
r_Laura_017-cv-
00998_1

PLAINTIFFS' LAST NAME - Gruetzmacher
PLAINTIFFS' FIRST NAME - Laura
CASE NO. - 0:17-cv-00998
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 07, 08, 09
SECTION III (SURGERY INFORMATION) -
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 12, 2017

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty, & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Guzman v. 3M Company Case No.: 0:17-cv-01017-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Guzman_Maria_017-cv-01017_1_Guzman_Maria_017-cv-01017_1"

Guzman_Maria_017-
cv-
01017_1_Guzman_Mar
ia_017-cv-01017_1

PLAINTIFFS' LAST NAME - Guzman

PLAINTIFFS' FIRST NAME - Maria

CASE NO. - 0:17-cv-01017

SECTION I (CASE INFORMATION) -

SECTION II (PERSONAL INFORMATION) - Incomplete

SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 09, 10

SECTION III (SURGERY INFORMATION) -

SECTION IV - 1 (VITAL STATISTICS) -

SECTION IV - 10 (DRUG/ALCOHOL) -

SECTION IV - 3 (HEALTHCARE PROVIDERS) -

SECTION IV - 7 (PHARMACIES/DRUGSTORES) -

SECTION IV - 8 (DENTAL PROCEDURES) -

SECTION IV - 9 (TOBACCO) -

SECTION IX - 1 (CONSORTIUM NAME ETC.) -

SECTION IX - 3 (RESIDENCES) -

SECTION IX - 4 (MARRIED) -

SECTION V - 5 (DISABILITY CLAIMS) -

SECTION V - 6 (LAWSUITS) -

SECTION V - 7 (BANKRUPTCY) -

SECTION VI - 1 (PHYSICAL INJURY) - Incomplete

SECTION VI - 3 (EMOTIONAL DISTRESS) -

SECTION VI - 6 (WARNINGS) -

SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -

SECTION VI - 8 (3M/ARIZANT WARRANTY) -

SECTION VI - 9 (AUGUSTINE) -

SECTION VII - 1 (LOST PAST WAGES) -

SECTION VII - 2 (LOST FUTURE WAGES) -

SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -

X.01 - SIGNED AUTHORIZATION - Incomplete

X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete

I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.

I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com

EXHIBIT C

From: Ben Hulse

Sent: Tuesday, November 14, 2017 4:12 PM

To: 'JoanEricksen_Chambers@mnd.uscourts.gov' <JoanEricksen_Chambers@mnd.uscourts.gov>;
'Noel_Chambers@mnd.uscourts.gov' <Noel_Chambers@mnd.uscourts.gov>

Cc: Jerry Blackwell <blackwell@blackwellburke.com>; Bridget Ahmann
<Bridget.Ahmann@FaegreBD.com>; 'gzimmerman@meshbesh.com'
<gzimmerman@meshbesh.com>; 'bgordon@levinlaw.com' <bgordon@levinlaw.com>;
'MVC@ciresiconlin.com' <MVC@ciresiconlin.com>; 'JMC@CiresiConlin.com' <JMC@CiresiConlin.com>;
'David J. Szerlag' <david@pritzkerlaw.com>; 'Wendy Thayer' <wendy@pritzkerlaw.com>

Subject: Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for November 2017

Dear Judge Ericksen,

Even though this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117.

In October, the Court ordered that PFS disputes were deemed "addressed to the Court" notwithstanding the cancellation of the in-court conference. (Dkt. No. 959.) Defendants request the same for this month.

Best regards,
Ben Hulse
Counsel for Defendants

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street, Suite 2500
Minneapolis, MN 55415
Direct (612) 343-3256
Fax (612) 343-3205

This message and any attachments may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient or are not authorized to receive for the recipient, you are hereby notified that dissemination, distribution or copying of this message and any attachments is strictly prohibited. If you have received this message in error, please immediately advise the sender by reply e-mail and delete the message and any attachments. Thank you.

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Created November 14, 2017)

| Case Number | Title | Date Filed | Due Date | Comments | Prior Listing | Firm Name |
|---------------------------------------|-------------------------------------|------------|-------------------------------------|--|--------------------------------------|-----------------------------|
| 0:17-cv-01441-JNE-FLN | Morgan v. 3M Company et al | 5/1/2017 | 7/30/2017 | | 8/10/2017 9/07/2017 10/13/2017 | Bernstein Liebhard LLP |
| 0:17-cv-03008-JNE-FLN | Toland v. 3M Company et al | 7/17/2017 | 8/8/2017 8/14/2017; 9/13/2017 | Defendants granted Plaintiff two extensions. | 10/13/2017 | Brown & Crouppen, PC |
| 0:17-cv-02395-JNE-FLN | Hecht, Theodore v. 3M Company et al | 6/29/2017 | 9/27/2017 | | 10/13/2017 | Kirtland & Packard LLP |
| 0:17-cv-02394-JNE-FLN | Mucci v. 3M Company et al | 6/29/2017 | 9/27/2017 | | 10/13/2017 | Kirtland & Packard LLP |
| 0:17-cv-02685-JNE-FLN | Daniels et al v. 3M Company et al | 7/10/2017 | 10/8/2017 | | | Brown & Crouppen, PC |
| 0:17-cv-02747-JNE-FLN | Graves v. 3M Company et al | 7/11/2017 | 10/9/2017 | | | The Olinde Firm, LLC |
| 0:17-cv-02738-JNE-FLN | Allen v. 3M Company et al | 7/11/2017 | 10/9/2017 | | | The Olinde Firm, LLC |
| 0:17-cv-02755-JNE-FLN | Morris v. 3M Company et al | 7/11/2017 | 10/9/2017 | | | Kennedy Hodges, LLP |
| 0:17-cv-02881-JNE-FLN | Prince v. 3M Company et al | 7/13/2017 | 10/11/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-02853-JNE-FLN | Wallis v. 3M Company et al | 7/13/2017 | 10/11/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-02892-JNE-FLN | Saylor v. 3M Company et al | 7/14/2017 | 10/12/2017 | | | The Olinde Firm, LLC |
| 0:17-cv-03037-JNE-FLN | Flowers v. 3M Company et al | 7/18/2017 | 10/16/2017 | | | Kennedy Hodges, LLP |
| 0:17-cv-03038-JNE-FLN | Schapansky v. 3M Company et al | 7/18/2017 | 10/16/2017 | | | Kennedy Hodges, LLP |
| 0:17-cv-03112-JNE-FLN | Depew v. 3M Company et al | 7/19/2017 | 10/17/2017 | | | Kirtland & Packard LLP |
| 0:17-cv-03078-JNE-FLN | Torres v. 3M Company et al | 7/19/2017 | 10/17/2017 | | | Kennedy Hodges, LLP |
| 0:17-cv-03556-JNE-FLN | Clausen et al v. 3M Company et al | 8/4/2017 | 11/2/2017 | | | Hare, Wynn, Newell & Newton |

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices

(Created November 14, 2017)

| Case Number | Title | 1st Deficiency Notice Sent | Response Due Date | Prior Listing | Firm Name |
|---------------------------------------|---------------------------------|-------------------------------------|----------------------|------------------------|---|
| 0:17-cv-01706-JNE-FLN | Price et al v. 3M Company et al | 9/18/2017 | 10/09/2017 | | Walters Law Firm, LLC |
| 0:17-cv-01879-JNE-FLN | Sellers v. 3M Company et al | 9/28/2017 | 10/19/2017 | | Kennedy Hodges, LLP |
| 0:17-cv-01493-JNE-FLN | Grussing v. 3M Company et al | 10/11/2017 | 11/1/2017 | | Hendrickson Law |
| 0:17-cv-01027-JNE-FLN | Warren v. 3M Company et al | 10/12/2017 | 11/2/2017 | | Bernstein Liebhard LLP |
| 0:17-cv-01494-JNE-FLN | Six v. 3M Company et al | 10/12/2017 | 11/2/2017 | | Hendrickson Law |
| 0:17-cv-02099-JNE-FLN | Osborne v. 3M Company et al | 10/12/2017 | 11/2/2017 | | Kennedy Hodges, LLP |
| Case Number | Title | 2nd Deficiency Notice Sent | Response Due Date | | Firm Name |
| 0:17-cv-00286-JNE-FLN | Charles v. 3M Company et al. | 8/14/2017 | 9/4/2017 | 9/7/2017 10/13/2017 | The Law offices of Travis R. Walker, PA |
| 0:17-cv-01082-JNE-FLN | Petrakis v. 3M Company et al | 9/18/2017 | 10/9/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-01330-JNE-FLN | Yarbrough v. 3M Company | 9/27/2017 | 10/18/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| Case Number | Title | 3rd Deficiency Notice Sent | Response Due Date | Prior Listing | Firm Name |
| 0:17-cv-00288-JNE-FLN | Bradford v. 3M Company et al | 9/29/2017 | 10/20/2017 | | The Law offices of Travis R. Walker, PA |

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Created November 14, 2017)

| Case Number | Title | 3rd Deficiency Sent | Prior Listing | Firm Name |
|---------------------------------------|---|---------------------------|--|--|
| 0:15-cv-03951-JNE-FLN | Hernandez v. 3M Company et al | 4/11/2017 | 6/9/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017 | The Law offices of Travis R. Walker, PA |
| 0:15-cv-04004-JNE-FLN | Peterson v. 3M Company | 4/4/2017 | 4/14/2017; 6/09/2017 7/14/2017 10/13/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:16-cv-01153-JNE-FLN | Surgeon v. 3M Company | 4/20/2017 | 6/9/2017 07/14/2017 10/13/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:16-cv-01155-JNE-FLN | Sutter v. 3M Company | 4/21/2017 | 6/9/2017 07/14/2017 10/13/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:16-cv-02663-JNE-FLN | McKevitt et al v. 3M Company Inc et al | 4/4/2017 | 06/09/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017 | Brown & Crouppen, PC |
| 0:16-cv-03329-JNE-FLN | Gray v. 3M Company et al | 5/4/2017 | 06/09/2017 07/14/2017 10/13/2017 | Kirtland & Packard LLP |
| 0:16-cv-03618-JNE-FLN | Messner-Katzer v. 3M Company et al | 5/16/2017 | 06/09/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017 | icapretz@capretz.com |
| 0:16-cv-04154-JNE-FLN | Pavlovic v. 3M Company | 6/29/2017 | 6/9/2017 07/14/2017 10/13/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:17-cv-01134-JNE-FLN | Newman v. 3M Company et al | 7/13/2017 | 07/14/2017 08/11/2017 09/07/2017 10/13/2017 | Brown & Crouppen, PC |
| 0:16-cv-01364-JNE-FLN | Vernal v. 3M Company | 4/18/2017 | | Langdon & Emison |
| 0:16-cv-02298-JNE-FLN | Dandrea et al v. 3M Company et al | 4/19/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:16-cv-02428-JNE-FLN | King v. 3M Company et al | 4/19/2017 | | Kennedy Hodges, LLP |
| 0:16-cv-02957-JNE-FLN | Zivanovich v. 3M Company | 4/24/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Created November 14, 2017)

| | | | | |
|---------------------------------------|---|------------|------------|---|
| 0:16-cv-04038-JNE-FLN | Bell-Young v. 3M Company et al | 6/20/2017 | | Kirtland & Packard LLP |
| 0:16-cv-04161-JNE-FLN | Bond v. 3M Company | 6/30/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:17-cv-00343-JNE-FLN | Grooms v. 3M Company | 8/24/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:17-cv-00570-JNE-FLN | Harrison v. 3M Company | 9/1/2017 | 10/13/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:17-cv-00640-JNE-FLN | Johnson v. 3M Company et al | 10/3/2017 | | Brown & Crouppen, PC |
| 0:17-cv-00711-JNE-FLN | Garcia v. 3M Company | 10/16/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:17-cv-00998-JNE-FLN | Gruetzmacher v. 3M Company | 10/16/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:17-cv-01017-JNE-FLN | Guzman v. 3M Company | 10/16/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA |
| 0:17-cv-01389-JNE-FLN | Cooper et al v. 3M Company et al | 10/11/2017 | | Brown & Crouppen, PC |
| 0:17-cv-02194-JNE-FLN | Schriewer et al v. 3M Company et al | 10/12/2017 | | Brown & Crouppen, PC |
| 0:17-cv-02212-JNE-FLN | Smith, Leonard | 10/12/2017 | | Brown & Crouppen, PC |
| 0:17-cv-02254-JNE-FLN | Snider et al v. 3M Company et al | 10/12/2017 | | Brown & Crouppen, PC |
| 0:17-cv-02296-JNE-FLN | Weiner-Tuskes et al v. 3M Company et al | 10/12/2017 | | Brown & Crouppen, PC |
| 0:17-cv-02300-JNE-FLN | Young v. 3M Company et al | 10/12/2017 | | Brown & Crouppen, PC |
| 0:17-cv-02301-JNE-FLN | Stokes v. 3M Company et al | 10/12/2017 | | Brown & Crouppen, PC |
| 0:17-cv-02305-JNE-FLN | Wooden et al v. 3M Company et al | 10/12/2017 | | Brown & Crouppen, PC |
| 0:17-cv-02309-JNE-FLN | Smith et al v. 3M Company et al | 10/12/2017 | | Brown & Crouppen, PC |

EXHIBIT D

From: Ben Hulse

Sent: Monday, December 18, 2017 2:20 PM

To: 'JoanEricksen_Chambers@mnd.uscourts.gov' <JoanEricksen_Chambers@mnd.uscourts.gov>; 'Noel_Chambers@mnd.uscourts.gov' <Noel_Chambers@mnd.uscourts.gov>; 'Leary, William (Judge)' <William.Leary@courts.state.mn.us>

Cc: Jerry Blackwell <blackwell@blackwellburke.com>; 'Ahmann, Bridget M.' <Bridget.Ahmann@FaegreBD.com>; 'gzimmerman@meshbesh.com' <gzimmerman@meshbesh.com>; 'bgordon@levinlaw.com' <bgordon@levinlaw.com>; 'MVC@ciresiconlin.com' <MVC@ciresiconlin.com>; 'JMC@CiresiConlin.com' <JMC@CiresiConlin.com>; Mary Young <myoung@blackwellburke.com>

Subject: Joint Agenda and Status Report for December 21 Status Conference (MDL No. 15-2666 (JNE/FLN))

Dear Judge Ericksen and Judge Noel,

In accordance with Pretrial Order No. 3, the parties submit this Joint Agenda and Status Conference Report in preparation for the status conference scheduled for Thursday, December 21, at 9:30 a.m. We apologize for the delay in make this submission.

Defendants' three lists related to the Plaintiff Fact Sheets, as discussed in Section 2 of the Joint Agenda, are also attached to this email. Defendants' proposed pretrial order concerning the process for substitutions for deceased plaintiffs, referenced in Section 6, is also attached. As noted in the Joint Agenda, Plaintiffs will oppose entry of that proposed order.

We have copied Judge Leary here as well.

Best regards,
Ben Hulse

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street, Suite 2500
Minneapolis, MN 55415
Direct (612) 343-3256
Fax (612) 343-3205

This message and any attachments may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient or are not authorized to receive for the recipient, you are hereby notified that dissemination, distribution or copying of this message and any attachments is strictly prohibited. If you have received this message in error, please immediately advise the sender by reply e-mail and delete the message and any attachments. Thank you.

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated December 15, 2017)

| Case Number | Title | Date Filed | Due Date | Comments | Prior Listing | Firm Name |
|---------------------------------------|--------------------------------------|------------|------------|----------|--|------------------------------|
| 0:17-cv-01441-JNE-FLN | Morgan v. 3M Company et al | 5/1/2017 | 7/30/2017 | | 8/10/2017 9/07/2017 10/13/2017 11/07/2017 | Bernstein Liebhard LLP |
| 0:17-cv-02747-JNE-FLN | Graves v. 3M Company et al | 7/11/2017 | 10/9/2017 | | 11/7/2017 | The Olinde Firm, LLC |
| 0:17-cv-02738-JNE-FLN | Allen v. 3M Company et al | 7/11/2017 | 10/9/2017 | | 11/7/2017 | The Olinde Firm, LLC |
| 0:17-cv-02755-JNE-FLN | Morris v. 3M Company et al | 7/11/2017 | 10/9/2017 | | 11/7/2017 | Kennedy Hodges, L.L.P |
| 0:17-cv-02763-JNE-FLN | Maxheimer v. 3M Company et al | 7/11/2017 | 10/9/2017 | | 11/7/2017 | Kennedy Hodges, L.L.P |
| 0:17-cv-02881-JNE-FLN | Prince v. 3M Company et al | 7/13/2017 | 10/11/2017 | | 11/7/2017 | Bernstein Liebhard LLP |
| 0:17-cv-02853-JNE-FLN | Wallis v. 3M Company et al | 7/13/2017 | 10/11/2017 | | 11/7/2017 | Bernstein Liebhard LLP |
| 0:17-cv-02892-JNE-FLN | Saylor v. 3M Company et al | 7/14/2017 | 10/12/2017 | | 11/7/2017 | The Olinde Firm, LLC |
| 0:17-cv-03038-JNE-FLN | Schapansky v. 3M Company et al | 7/18/2017 | 10/16/2017 | | 11/7/2017 | Kennedy Hodges, L.L.P |
| 0:17-cv-03103-JNE-FLN | Ghidella v. 3M Company et al | 7/19/2017 | 10/17/2017 | | | Kennedy Hodges, L.L.P |
| 0:17-cv-03187-JNE-FLN | Gawthorp v. 3M Company et al | 7/21/2017 | 10/19/2017 | | | Kennedy Hodges, L.L.P |
| 0:17-cv-03252-JNE-FLN | Gorbett v. 3M Company et al | 7/23/2017 | 10/21/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-03380-JNE-FLN | Rowan v. 3M Company et al | 7/27/2017 | 10/24/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-03414-JNE-FLN | Towsley v. 3M Company et al | 7/27/2017 | 10/25/2017 | | | Sexton & Shelor |
| 0:17-cv-03413-JNE-FLN | Williams, Wanda v. 3M Company, et al | 7/28/2017 | 10/26/2017 | | | Sexton & Shelor |
| 0:17-cv-03441-JNE-FLN | Landers v. 3M Company et al | 7/28/2017 | 10/26/2017 | | | Kirtland and Packard LLP |
| 0:17-cv-03440-JNE-FLN | Williams v. 3M Company et al | 7/31/2017 | 10/29/2017 | | | Kirtland and Packard LLP |
| 0:17-cv-03573-JNE-FLN | Parker v. 3M Company et al | 8/4/2017 | 11/2/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-03658-JNE-FLN | Beach v. 3M Company et al | 8/9/2017 | 11/7/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-03679-JNE-FLN | Elliott, Steve v. 3M Company et al | 8/11/2017 | 11/9/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-03811-JNE-FLN | Pope v. 3M Company et al | 8/17/2017 | 11/15/2017 | | | Kirtland and Packard LLP |
| 0:17-cv-03819-JNE-FLN | Mazer v. 3M Company et al | 8/18/2017 | 11/15/2017 | | | Hollis Legal Solutions, PLLC |
| 0:17-cv-03823-JNE-FLN | Miller, Carol v. 3M Company et al | 8/18/2017 | 11/15/2017 | | | Bernstein Liebhard LLP |

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated December 15, 2017)

| Case Number | Title | Date Filed | Due Date | Comments | Prior Listing | Firm Name |
|---------------------------------------|---|------------|------------|----------|---------------|---------------------------------|
| 0:17-cv-03868-JNE-FLN | Montgomery, Harold et al v. 3M Company et al | 8/22/2017 | 11/19/2017 | | | Schlichter Bogard & Denton, LLP |
| 0:17-cv-03895-JNE-FLN | Loving v. 3M Company et al | 8/23/2017 | 11/20/2017 | | | Kennedy Hodges |
| 0:17-cv-03937-JNE-FLN | Siegel v. 3M Company et al | 8/24/2017 | 11/21/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-03948-JNE-FLN | Gilliam et al v. 3M Company et al | 8/25/2017 | 11/23/2017 | | | Brent Coon & Associates |
| 0:17-cv-03950-JNE-FLN | Jacks et al v. 3M Company et al | 8/25/2017 | 11/23/2017 | | | Brent Coon & Associates |
| 0:17-cv-03952-JNE-FLN | Pratt et al v. 3M Company et al | 8/25/2017 | 11/23/2017 | | | Brent Coon & Associates |
| 0:17-cv-03956-JNE-FLN | Reeves v. 3M Company et al | 8/25/2017 | 11/23/2017 | | | Kennedy Hodges |
| 0:17-cv-03954-JNE-FLN | Rietz et al v. 3M Company et al | 8/25/2017 | 11/23/2017 | | | Brent Coon & Associates |
| 0:17-cv-03962-JNE-FLN | Sale et al v. 3M Company et al | 8/25/2017 | 11/23/2017 | | | Brent Coon & Associates |
| 0:17-cv-03964-JNE-FLN | Taylor, Whitney and Pat et al v. 3M Company et al | 8/25/2017 | 11/23/2017 | | | Brent Coon & Associates |
| 0:17-cv-03994-JNE-FLN | Cook, Delores v. 3M Company et al | 8/25/2017 | 11/23/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-03997-JNE-FLN | Keith, Wesley v. 3M Company et al | 8/28/2017 | 11/25/2017 | | | The Miller Firm, LLC |
| 0:17-cv-04005-JNE-FLN | Salazar v. 3M Company et al | 8/28/2017 | 11/25/2017 | | | Kirtland and Packard LLP |
| 0:17-cv-04028-JNE-FLN | Allagas v. Arizant Healthcare, Inc. et al | 8/29/2017 | 11/26/2017 | | | Kirtland and Packard LLP |
| 0:17-cv-04009-JNE-FLN | Rude v. 3M Company et al | 8/30/2017 | 11/27/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-04043-JNE-FLN | Ground v. 3M Company et al | 8/30/2017 | 11/27/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-04094-JNE-FLN | O'Connell v. 3M Company et al | 8/31/2017 | 11/28/2017 | | | Bachus & Schanker, LLC |
| 0:17-cv-04084-JNE-FLN | Pemberton, Debora v. 3M Company et al | 8/31/2017 | 11/28/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-04065-JNE-FLN | Smigla v. 3M Company et al | 8/31/2017 | 11/28/2017 | | | Bernstein Liebhard LLP |
| 0:17-cv-04143-JNE-FLN | Gregovich v. 3M Company et al | 9/5/2017 | 12/4/2017 | | | Kirtland and Packard LLP |
| 0:17-cv-04145-JNE-FLN | Harper v. 3M Company et al | 9/5/2017 | 12/4/2017 | | | Kirtland and Packard LLP |

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated December 15, 2017)

| Case Number | Title | Date Filed | Due Date | Comments | Prior Listing | Firm Name |
|---------------------------------------|--|------------|------------|----------|---------------|-----------------------------|
| 0:17-cv-04148-JNE-FLN | Thomas, Collin et al v. 3M Company et al | 9/6/2017 | 12/5/2017 | | | Bachus & Schanker, LLC |
| 0:17-cv-04158-JNE-FLN | Young, Debra v. 3M Company et al | 9/7/2017 | 12/6/2017 | | | Kirtland and Packard LLP |
| 0:17-cv-04177-JNE-FLN | Butler, James v. 3M Company et al | 9/7/2017 | 12/6/2017 | | | Kennedy Hodges |
| 0:17-cv-04182-JNE-FLN | Roberts, Carol v. 3M Company et al | 9/7/2017 | 12/6/2017 | | | Kirtland and Packard LLP |
| 0:17-cv-04230-JNE-FLN | Metivier v. 3M Company et al | 9/12/2017 | 12/11/2017 | | | Kirtland and Packard LLP |
| 0:17-cv-03941-JNE-FLN | Martinez v. 3M Company et al | 8/24/2017 | 11/29/2017 | | | DeGaris & Rogers, LLC |
| 0:17-cv-03925-JNE-FLN | Smith, June v. 3M Company et al | 8/24/2017 | 11/29/2017 | | | DeGaris & Rogers, LLC |

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated December 15, 2017)

| Case Number | Title | 1st Deficiency Notice Sent | Response Due Date | Prior Listing | Firm Name |
|---------------------------------------|----------------------------------|-------------------------------------|----------------------|--------------------------------------|--|
| 0:17-cv-01879-JNE-FLN | Sellers v. 3M Company et al | 9/28/2017 | 10/19/2017 | 11/7/2017 | Kennedy Hodges, L.L.P. |
| 0:17-cv-01027-JNE-FLN | Warren v. 3M Company et al | 10/12/2017 | 11/2/2017 | 11/7/2017 | Bernstein Liebhard LLP |
| 0:17-cv-02099-JNE-FLN | Osborne v. 3M Company et al | 10/12/2017 | 11/2/2017 | 11/7/2017 | Kennedy Hodges, L.L.P. |
| 0:17-cv-02231-JNE-FLN | Nunn v. 3M Company et al | 10/18/2017 | 11/8/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-02319-JNE-FLN | Taylor, Mary v. 3M Company et al | 10/24/2017 | 11/15/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-02383-JNE-FLN | Blancett v. 3M Company et al | 10/25/2017 | 11/16/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-02415-JNE-FLN | Pickett v. 3M Company et al | 10/25/2017 | 11/16/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-02452-JNE-FLN | Suchan v. 3M Company et al | 10/25/2017 | 11/16/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-02589-JNE-FLN | Rashad v. 3M Company et al | 10/31/2017 | 11/21/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-02642-JNE-FLN | Richey v. 3M Company et al | 11/2/2017 | 11/23/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-02726-JNE-FLN | McCall v. 3M Company et al | 11/7/2017 | 11/28/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-02745-JNE-FLN | Devries v. 3M Company et al | 11/6/2017 | 11/27/2017 | | The Olinde Firm, LLC |
| 0:17-cv-03795-JNE-FLN | Winston v. 3M Company et al | 11/8/2017 | 11/29/2017 | | Bachus & Schanker, LLC |
| 0:17-cv-03101-JNE-FLN | Perry v. 3M Company et al | 11/14/2017 | 12/5/2017 | | Kennedy Hodges, L.L.P. |
| 0:17-cv-03233-JNE-FLN | McLaughlin v. 3M Company et al | 11/17/2017 | 12/8/2017 | | Kennedy Hodges, L.L.P. |
| Case Number | Title | 2nd Deficiency Notice Sent | Response Due Date | | Firm Name |
| 0:17-cv-00286-JNE-FLN | Charles v. 3M Company et al. | 8/14/2017 | 9/4/2017 | 9/7/2017 10/13/2017 11/07/2017 | The Law offices of Travis R. Walker, P.A |
| 0:17-cv-01082-JNE-FLN | Petrakis v. 3M Company et al | 9/18/2017 | 10/9/2017 | 11/7/2017 | Kennedy Hodges, L.L.P. |
| 0:17-cv-01122-JNE-FLN | Griggs v. 3M Company et al | 10/25/2017 | 11/15/2017 | | The Olinde Firm, LLC |
| 0:17-cv-01731-JNE-FLN | Ethelbah v. 3M Company et al | 11/14/2017 | 12/5/2017 | | Lockridge, Grindal Nauen P.L.L.P. |
| 0:16-cv-04381-JNE-FLN | Manzanares v. 3M Company et al | 11/20/2017 | 12/11/2017 | | Bernstein Liebhard LLP |

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated December 15, 2017)

| Case Number | Title | 3rd Deficiency Sent | Prior Listing | Firm Name |
|---------------------------------------|---------------------------------------|---------------------------|--|---|
| 0:16-cv-03618-JNE-FLN | Messner-Katzer v. 3M Company et al | 5/16/2017 | 06/09/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017 | Capretz & Associates |
| 0:17-cv-00343-JNE-FLN | Grooms v. 3M Company | 8/24/2017 | 11/7/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A. |
| 0:17-cv-00570-JNE-FLN | Harrison v. 3M Company | 9/1/2017 | 10/13/2017 11/7/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A. |
| 0:17-cv-00640-JNE-FLN | Johnson v. 3M Company et al | 10/3/2017 | 11/7/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A. |
| 0:17-cv-00711-JNE-FLN | Garcia v. 3M Company | 10/16/2017 | 11/7/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A. |
| 0:17-cv-00998-JNE-FLN | Gruetzmacher v. 3M Company | 10/16/2017 | 11/7/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A. |
| 0:17-cv-01017-JNE-FLN | Guzman v. 3M Company | 10/16/2017 | 11/7/2017 | Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A. |
| 0:17-cv-02212-JNE-FLN | Smith, Leonard | 10/12/2017 | 11/7/2017 | Brown & Crouppen, PC |
| 0:16-cv-03991-JNE-FLN | Overko v. 3M Company | 6/30/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A. |
| 0:17-cv-01139-JNE-FLN | Husman v. 3M Company | 11/1/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A. |
| 0:17-cv-01407-JNE-FLN | Jadwin et al v. 3M Company et al | 11/8/2017 | | Brown and Crouppen, P.C. |
| 0:17-cv-01323-JNE-FLN | Peters v. 3M Company | 11/13/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A |
| 0:17-cv-01215-JNE-FLN | Pickens v. 3M Company | 11/13/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A |
| 0:17-cv-01250-JNE-FLN | Sparks v. 3M Company | 11/13/2017 | | Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A |

EXHIBIT E



KIMBERLY LAMBERT ADAMS
BRIAN H. BARR
MICHAEL C. BIXBY
M. ROBERT BLANCHARD
BRANDON L. BOGLE
W. TROY BOUK
WESLEY A. BOWDEN
VIRGINIA M. BUCHANAN
WILLIAM F. CASH III
JEFF GADDY
RACHAEL R. GILMER
FREDRIC G. LEVIN
MARTIN H. LEVIN

STEPHEN A. LUONGO
M. JUSTIN LUSKO
ANDREW E. McGRAW
NEIL E. McWILLIAMS, JR.
CLAY MITCHELL
PETER J. MOUGEY
DANIEL A. NIGH
TIMOTHY M. O'BRIEN
MIKE PAPANTONIO
CHRISTOPHER G. PAULOS
EMMIE J. PAULOS
A. RENEE PRESTON
ROBERT E. PRICE

MARK J. PROCTOR
TROY A. RAFFERTY
MATTHEW D. SCHULTZ
W. CAMERON STEPHENSON
LEO A. THOMAS
BRETT VIGODSKY
MALLORY J. MANGOLD
(LICENSED ONLY IN ALABAMA
AND MISSISSIPPI)
OF COUNSEL:
LAURA S. DUNNING
(LICENSED ONLY IN ALABAMA)

BEN W. GORDON, JR.
ARCHIE C. LAMB, JR.
(LICENSED IN ALABAMA AND FLORIDA)
ROBERT M. LOEHR
PAGE A. POERSCHKE
(LICENSED ONLY IN ALABAMA)
LEFFERTS L. MABIE, JR. (1925-1996)
D.L. MIDDLEBROOKS (1926-1997)
DAVID H. LEVIN (1928-2002)
STANLEY B. LEVIN (1938-2009)

September 12, 2017

RECEIVED
SEP 14 2017

BY:CK.....

VIA FEDEX

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street
Suite 2500
Minneapolis, MN 55415
bhulse@blackwellburke.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Grooms vs. 3M Company, Case No. 0:17-cv-00343-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Daniel A. Nigh

DAN/ec
Enclosure

Response to Deficiencies

Grooms vs. 3M Company, Case No. 0:17-cv-00343-JNE-FLN

As of today's date, Tuesday, September 12, 2017, we have been unable to reach client to get deficiency questions answered.



KIMBERLY LAMBERT ADAMS
BRIAN H. BARR
MICHAEL C. BIXBY
M. ROBERT BLANCHARD
BRANDON L. BOGLE
W. TROY BOUK
WESLEY A. BOWDEN
VIRGINIA M. BUCHANAN
WILLIAM F. CASH III
JEFF GADDY
RACHAEL R. GILMER
FREDRIC G. LEVIN
MARTIN H. LEVIN

STEPHEN A. LUONGO
M. JUSTIN LUSKO
NEIL E. McWILLIAMS, JR.
CLAY MITCHELL
PETER J. MOUGEY
DANIEL A. NIGH
TIMOTHY M. O'BRIEN
MIKE PAPANTONIO
CHRISTOPHER G. PAULO
EMMIE J. PAULO
A. RENEE PRESTON
ROBERT E. PRICE
MARK J. PROCTOR

TROY A. RAFFERTY
MATTHEW D. SCHULTZ
W. CAMERON STEPHENSON
THOMAS A. TAYLOR
LEO A. THOMAS
BRETT VIGODSKY
MALLORY J. MANGOLD
(LICENSED ONLY IN ALABAMA
AND MISSISSIPPI)
OF COUNSEL:
LAURA S. DUNNING
(LICENSED ONLY IN ALABAMA)

BEN W. GORDON, JR.
ARCHIE C. LAMB, JR.
(LICENSED IN ALABAMA AND FLORIDA)
ROBERT M. LOEHR
PAGE A. POERSCHKE
(LICENSED ONLY IN ALABAMA)
LEFFERTS L. MABIE, JR. (1925-1996)
D.L. MIDDLEBROOKS (1926-1997)
DAVID H. LEVIN (1928-2002)
STANLEY B. LEVIN (1938-2009)

November 1, 2017

RECEIVED
NOV 02 2017

VIA FEDEX

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street
Suite 2500
Minneapolis, MN 55415
bhulse@blackwellburke.com

BY: *CX*

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Gilbert Garcia v. 3M Company, Case No. 0:17-cv-00711-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Daniel A. Nigh
Daniel A. Nigh

DAN/ec
Enclosure

Response to Deficiencies

Gilbert Garcia v. 3M Company, Case No. 0:17-cv-00711-JNE-FLN

Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.



KIMBERLY LAMBERT ADAMS
BRIAN H. BARR
MICHAEL C. BIXBY
M. ROBERT BLANCHARD
BRANDON L. BOGLE
W. TROY BOUK
WESLEY A. BOWDEN
VIRGINIA M. BUCHANAN
WILLIAM F. CASH III
JEFF GADDY
RACHAEL R. GILMER
FREDRIC G. LEVIN
MARTIN H. LEVIN

STEPHEN A. LUONGO
M. JUSTIN LUSKO
NEIL E. McWILLIAMS, JR.
CLAY MITCHELL
PETER J. MOUGEY
DANIEL A. NIGH
TIMOTHY M. O'BRIEN
MIKE PAPANTONIO
CHRISTOPHER G. PAULOS
EMMIE J. PAULOS
A. RENEE PRESTON
ROBERT E. PRICE
MARK J. PROCTOR

TROY A. RAFFERTY
MATTHEW D. SCHULTZ
W. CAMERON STEPHENSON
THOMAS A. TAYLOR
LEO A. THOMAS
BRETT VIGODSKY
MALLORY J. MANGOLD
(LICENSED ONLY IN ALABAMA
AND MISSISSIPPI)
OF COUNSEL:
LAURA S. DUNNING
(LICENSED ONLY IN ALABAMA)

BEN W. GORDON, JR.
ARCHIE C. LAMB, JR.
(LICENSED IN ALABAMA AND FLORIDA)
ROBERT M. LOEHR
PAGE A. POERSCHKE
(LICENSED ONLY IN ALABAMA)
LEFFERTS L. MABIE, JR. (1925-1996)
D.L. MIDDLEBROOKS (1926-1997)
DAVID H. LEVIN (1928-2002)
STANLEY B. LEVIN (1938-2009)

November 1, 2017

RECEIVED
NOV 02 2017

BY: CK

VIA FEDEX

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street
Suite 2500
Minneapolis, MN 55415
bhulse@blackwellburke.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Laura Gruetzmacher v. 3M Company, Case No. 0:17-cv-00998-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Daniel A. Nigh

DAN/ec
Enclosure

Response to Deficiencies

Laura Gruetzmacher v. 3M Company, Case No. 0:17-cv-00998-JNE-FLN

Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.



KIMBERLY LAMBERT ADAMS
BRIAN H. BARR
MICHAEL C. BIXBY
M. ROBERT BLANCHARD
BRANDON L. BOGLE
W. TROY BOUK
WESLEY A. BOWDEN
VIRGINIA M. BUCHANAN
WILLIAM F. CASH III
JEFF GADDY
RACHAEL R. GILMER
FREDRIC G. LEVIN
MARTIN H. LEVIN

STEPHEN A. LUONGO
M. JUSTIN LUSKO
NEIL E. McWILLIAMS, JR.
CLAY MITCHELL
PETER J. MOUGEY
DANIEL A. NIGH
TIMOTHY M. O'BRIEN
MIKE PAPANTONIO
CHRISTOPHER G. PAULOS
EMMIE J. PAULOS
A. RENEE PRESTON
ROBERT E. PRICE
MARK J. PROCTOR

TROY A. RAFFERTY
MATTHEW D. SCHULTZ
W. CAMERON STEPHENSON
THOMAS A. TAYLOR
LEO A. THOMAS
BRETT VIGODSKY
MALLORY J. MANGOLD
(LICENSED ONLY IN ALABAMA
AND MISSISSIPPI)
OF COUNSEL:
LAURA S. DUNNING
(LICENSED ONLY IN ALABAMA)

BEN W. GORDON, JR.
ARCHIE C. LAMB, JR.
(LICENSED IN ALABAMA AND FLORIDA)
ROBERT M. LOEHR
PAGE A. POERSCHKE
(LICENSED ONLY IN ALABAMA)
LEFFERTS L. MABIE, JR. (1925-1996)
D.L. MIDDLEBROOKS (1926-1997)
DAVID H. LEVIN (1928-2002)
STANLEY B. LEVIN (1938-2009)

November 1, 2017

RECEIVED
NOV 6 2 2017

BY: *ck*

VIA FEDEX

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street
Suite 2500
Minneapolis, MN 55415
bhulse@blackwellburke.com

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Maria Guzman v. 3M Company, Case No. 0:17-cv-01017-JNE-FLN*

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Dan A. Nigh
Daniel A. Nigh

DAN/ec
Enclosure

Response to Deficiencies

Maria Guzman v. 3M Company, Case No. 0:17-cv-01017-JNE-FLN

Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.